

JP:WDS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

COURTNEY NOELLE DAVIS,

Defendant.

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

DEREK BERGMAN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 4, 2011, within the Eastern District of New York and elsewhere, defendant COURTNEY NOELLE DAVIS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On September 4, 2011, the defendant COURTNEY NOELLE DAVIS arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue Airlines Flight No. 842 from Santiago, Dominican Republic.

2. The defendant COURTNEY NOELLE DAVIS was selected by Customs and Border Protection ("CBP") Inspectors for a routine inspection. During an examination of the defendant's baggage, CBP Inspectors noticed that defendant COURTNEY NOELLE DAVIS appeared nervous, was sweating, and her hands were shaking.

3. At that point, the defendant was escorted to a private search area and a pat-down search was conducted, which revealed a hard object in the defendant's groin area. When questioned about the object, the defendant removed a cylindrical object from her groin area. The cylindrical object was probed, which revealed a brown, powdery substance that field tested positive for heroin. The defendant was placed under arrest. At that point, the defendant admitted that she had also ingested pellets containing narcotics.

4. The defendant was then taken to the JFK medical facility, where an x-ray was taken of defendant's intestinal tract, which was positive for foreign bodies.

5. Defendant COURTNEY NOELLE DAVIS will be detained at the JFK medical facility until such time as he has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that
defendant COURTNEY NOELLE DAVIS be dealt with according to law.

DEREK BERGMAN
Special Agent
Homeland Security Investigations

Sworn to before me this
6th day of September, 2011

THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK